

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

HERANOSH KHOSHABA,

Plaintiff,

v.

FILTRONA EXTRUSION USA, INC.

Defendant.

Case No. 08-CV-2766

Judge Joan B. Gottschall
Magistrate Judge Maria Valdez

JOINT INITIAL STATUS CONFERENCE REPORT

In advance of, and in preparation for, the Initial Status Conference in the above-referenced matter on July 23, 2008, at 9:30 a.m., the parties hereby submit this Joint Initial Status Conference Report, outlining the matters set forth in the Court's Case Management Packet with respect to the Conference.

1. Nature and Scope of Case

Plaintiff in this case, Heranosh Khoshaba, alleges that she was discharged in retaliation for exercising her rights under the Illinois Workers' Compensation Act. Defendant Filtrona Extrusion USA, Inc. denies Plaintiff's allegations or that she was discriminated or retaliated against in any way.

2. Settlement Opportunities

The parties have not yet discussed settlement at any length. Some initial discovery is required for the parties to ascertain potential settlement opportunities in the matter.

3. Reassignment of Case to Magistrate Judge

The parties do not consent to the reassignment of the case to a magistrate judge.

4. Initial Discovery Parameters

The parties anticipate that fact discovery in the case should take approximately six months. Each side contemplates taking approximately 5-10 depositions, depending upon information learned during discovery. At this point, the parties do not contemplate requiring expert witnesses, but reserve their right to use such witnesses if the need arises throughout the course of discovery.

5. Future Conferences and Motions

At this point, the parties are not aware of future conferences or motion hearings that need to be scheduled.

Dated: July 17, 2008

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on July 17, 2008, I electronically transmitted the foregoing **Joint Initial Status Conference Report** to the Clerk of the Court by using the CM/ECF system which will send notice of electronic filing to the following:

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